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2 HONORABLE THOMAS S. ZILLY
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9 UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE
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11 ANN TOMKINS, as Personal Representative of the
ESTATE OF FLORENCE TOMKINS, a
Washington resident,

12 Plaintiff,

13 v.

14 RELIASTAR LIFE INSURANCE COMPANY, a
Minnesota corporation,

15 Defendant.

16 Case No. 2:18-cv-01488-TSZ
17

JOINT STIPULATED MOTION
AND ORDER TO EXTEND
EXPERT DISCLOSURE
DEADLINE

18 Pursuant to Local Civil Rules 7(j) and 10(g) and Federal Rule of Civil Procedure 6(b)(1),
19 undersigned counsel for Plaintiff Ann Tomkins and Defendant Reliastar Insurance Company
20 jointly move the Court for an Order extending the time for amending the pleadings and
21 exchanging expert reports. Specifically, the parties jointly move that the current August 19,
22 2019 be extended until September 23, 2019.

23 Throughout the course of this litigation, the parties have worked cooperatively to
24 schedule and, when needed, re-schedule motions and discovery to accommodate the respective
25 schedules of counsel and deponents. Consistent with this practice, plaintiff Tomkins agreed to
26 take off-calendar (and reschedule) multiple depositions of certain current and former employees
of defendant Reliastar and/or its affiliates that were originally set for early July 2019, and
JOINT STIPULATED MOTION AND ORDER TO
EXTEND EXPERT DISCLOSURE DEADLINE - 1
Case No. 2:18-cv-01488-TSZ

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1 defendant Reliastar agreed to re-note its pending summary judgment motion to accommodate
2 rescheduled depositions. Those depositions have now been rescheduled to occur in late-August
3 and early-September 2019 at various different locations to accommodate summer schedules of
4 counsel and deponents. Defendant Reliastar's pending summary judgment motion is now noted
5 for September 20, 2019.

6 The Parties wish to avoid unnecessary expert discovery practice and expense, and
7 anticipate that those rescheduled depositions and the completion of the parties' summary
8 judgment briefing will facilitate that by enabling the parties to identify/narrow the particular
9 factual disputes to which expert opinions might be helpful or necessary.

10 The parties are not requesting an extension of the current November 18, 2019 discovery
11 deadline or the December 19, 2019 dispositive motions deadline. The approximately one-month
12 extension of the expert report deadline will still give the parties two months after that deadline to
13 conduct expert discovery and exchange any rebuttal reports, and three months after that extended
14 deadline to file any additional dispositive motions. In short, the parties believe the requested
15 expert report extension will acknowledge cooperation between the parties and facilitate economy
16 and efficiency without in any way impeding delaying the progress of this action toward trial.

17 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

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JOINT STIPULATED MOTION AND ORDER TO
EXTEND EXPERT DISCLOSURE DEADLINE - 2
Case No. 2:18-cv-01488-TSZ

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DATED this 12th day of August, 2019.
2

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JOINT STIPULATED MOTION AND ORDER TO
EXTEND EXPERT DISCLOSURE DEADLINE - 3
Case No. 2:18-cv-01488-TSZ

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ORDER

IT IS SO ORDERED that the deadline for amending the pleadings and exchanging expert reports is extended until September 23, 2019. All other dates set forth in the Court's January 14, 2019 Minute Order Setting Trial Date And Related Dates, docket no. 27, shall remain the same.

DATED this 13th day of August, 2019.

Thomas S. Bally

Thomas S. Zilly
United States District Judge

Jointly Presented by:

s/Bradley W. Hoff

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**JOINT STIPULATED MOTION AND ORDER TO
EXTEND EXPERT DISCLOSURE DEADLINE - 4**

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**JOINT STIPULATED MOTION AND ORDER TO
EXTEND EXPERT DISCLOSURE DEADLINE - 5**

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